



**County of Los Angeles  
DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

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May 27, 2016

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From: Philip L. Browning  
Director

**CONCEPT 7 FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW**

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of Concept 7 Foster Family Agency (the FFA) in November 2015. The FFA has two licensed offices, one located in the Fourth Supervisorial District and one in San Bernardino County. Both offices provide services to the County of Los Angeles DCFS placed children. According to the FFA's Program Statement, its stated purpose is "to ease the suffering of abused and neglected children by providing a continuum of family-centered treatment and support-related programs. This includes early intervention with at-risk families as well as foster care for children who require out-of-home placement."

At the time of the review, the FFA supervised 205 placed children in 88 Certified Foster Homes (CFHs). The placed children's average length of placement was 30 months and their average age was 12.

**SUMMARY**

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe in the FFA CFHs; having been provided with good care and appropriate services; being comfortable in their placement environment; and being treated with respect and dignity. The Certified Foster Parents (CFPs) reported being supported by the FFA staff in their efforts to provide care and supervision to the children placed in their homes.

The FFA was in full compliance with 8 of 11 areas of CAD's Contract Compliance Review: Certified Foster Homes; Facility and Environment; Education and Workforce Readiness;

*"To Enrich Lives Through Effective and Caring Services"*

Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; and Discharged Children.

CAD noted deficiencies in the areas of: Licensure/Contract Requirements, related to a Special Incident Report (SIR) that was not submitted timely, and Community Care Licensing (CCL) citations; Maintenance of Required Documentation and Service Delivery, related to the FFA not obtaining the DCFS Children's Social Worker's (CSW's) authorization to implement Needs and Services Plans (NSPs), and CFPs not participating in the development of NSPs; and Personnel Records, related to one employee not receiving the required ongoing training.

Attached are the details of CAD's review.

### **REVIEW OF REPORT**

On December 29, 2015, Matthew St. John, DCFS CAD, held an exit conference with FFA representatives John Peel, Chief Executive Officer (CEO), and Ana Zimmer, Regional Director. The FFA representatives agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve the FFA's compliance with regulatory standards; and agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

A copy of this compliance report has been sent to the Auditor-Controller and CCL.

The FFA provided the attached approved Compliance CAP addressing the recommendations noted in this compliance report. The Out-of-Home Care Management Division provided technical assistance to the FFA on December 14, 2015, to assist the FFA with implementing their CAP.

If you have any questions, your staff may contact me or Aldo Marin, Board Relations Manager, at (213) 351-5530.

PLB:KR  
LTI:ms

### **Attachments**

c: Sachi A. Hamai, Chief Executive Officer  
John Naimo, Auditor-Controller  
Public Information Office  
Audit Committee  
John Peel, Chief Executive Officer, Concept 7 FFA  
Lajuannah Hills, Regional Manager, Community Care Licensing Division  
Lenora Scott, Regional Manager, Community Care Licensing Division

**CONCEPT 7 FOSTER FAMILY AGENCY  
CONTRACT COMPLIANCE REVIEW SUMMARY**

**13020 Bailey Street  
Whittier, CA 90601  
License Number: 197806457**

**2990 Inland Empire Blvd., Ste. 100  
Ontario, CA 91764  
License Number: 336412280**

	<b>Contract Compliance Review</b>	<b>Findings: November 2015</b>
<b>I</b>	<b><u>Licensure/Contract Requirements</u> (7 Elements)</b> <ol style="list-style-type: none"> <li>1. Timely Notification for Child's Relocation</li> <li>2. Timely, Cross-Reported SIRs</li> <li>3. Runaway Procedures in Accordance with the Contract</li> <li>4. Are there CCL Citations/OHCMD Safety Reports</li> <li>5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training</li> <li>6. FFA Pays Certified Foster Parents (CFP) Whole Foster Family Home Payments</li> <li>7. FFA Conducts an Assessment of CFP Prior to Placement of 2 or More Children</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Improvement Needed</li> <li>3. Full Compliance</li> <li>4. Improvement Needed</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Full Compliance</li> </ol>
<b>II</b>	<b><u>Certified Foster Homes</u> (12 Elements)</b> <ol style="list-style-type: none"> <li>1. Home Study and Safety Inspection Conducted Prior to Certification</li> <li>2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification</li> <li>3. Timely Criminal Clearances Federal Bureau of Investigation (FBI), California Department of Justice (DOJ), Child Abuse Central Index (CACI) Prior to Certification</li> <li>4. Timely, Completed, Signed Criminal Background Statement</li> <li>5. Health Screening &amp; Tuberculosis (TB) Test Prior to Certification</li> <li>6. All Required Training Prior to Certification</li> <li>7. Certificate of Approval on File/Including Capacity</li> <li>8. Safety Inspection Completed At Least Every Six Months or Per Approved Program Statement</li> <li>9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates</li> <li>10. Current Driver's License/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers</li> <li>11. Criminal Clearances and Health Screening/Driver's License/CPR/FBI/DOJ/CACI/Auto Insurance for Other Adults in the Home</li> </ol>	<p style="text-align: center;"><b>Full Compliance (All)</b></p>

CONCEPT 7 FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW  
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	12. FFA Assists CFPs in Providing Transportation Needs	
III	<b><u>Facility and Environment</u></b> (7 Elements) <ol style="list-style-type: none"> <li>1. Exterior/Grounds Well Maintained</li> <li>2. Common Areas Well Maintained</li> <li>3. Children's Bedrooms/Interior Well Maintained</li> <li>4. Sufficient and Appropriate Educational Resources</li> <li>5. Adequate Perishable and Non-Perishable Food</li> <li>6. CFP Conducted Disaster Drills and Documentation Maintained</li> <li>7. Money and Clothing Allowance Logs Maintained</li> </ol>	Full Compliance (All)
IV	<b><u>Maintenance of Required Documentation and Service Delivery</u></b> (10 Elements) <ol style="list-style-type: none"> <li>1. FFA Obtains or Documents Efforts to Obtain DCFS Children's Social Worker's (CSW's) Authorization to Implement NSPs</li> <li>2. CFPs Participated in the Development of the NSPs</li> <li>3. Children Progressing Towards Meeting NSP Goals</li> <li>4. FFA Social Workers Develop Timely, Comprehensive Initial NSP with Child's Participation</li> <li>5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation</li> <li>6. Therapeutic Services Received</li> <li>7. Recommended Assessments/Evaluations Implemented</li> <li>8. DCFS Children's Social Worker's Monthly Contacts Documented in Child's Case File</li> <li>9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports</li> <li>10. FFA Social Workers Conduct Required Visits</li> </ol>	<ol style="list-style-type: none"> <li>1. Improvement Needed</li> <li>2. Improvement Needed</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Full Compliance</li> <li>8. Full Compliance</li> <li>9. Full Compliance</li> <li>10. Full Compliance</li> </ol>
V	<b><u>Education and Workforce Readiness</u></b> (5 Elements) <ol style="list-style-type: none"> <li>1. Children Enrolled in School Within Three School Days</li> <li>2. Children Attend School as Required and FFA Facilitates in Meeting Children's Educational Goals</li> <li>3. Current Children's Report Cards/Progress Reports Maintained</li> <li>4. Children's Academic Performance and/or Attendance Increased</li> <li>5. FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs</li> </ol>	Full Compliance (All)

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VI	<b><u>Health and Medical Needs</u></b> (4 Elements) <ol style="list-style-type: none"> <li>1. Initial Medical Exams Conducted Timely</li> <li>2. Follow-Up Medical Exams Conducted Timely</li> <li>3. Initial Dental Exams Conducted Timely</li> <li>4. Follow-Up Dental Exams Conducted Timely</li> </ol>	Full Compliance (All)
VII	<b><u>Psychotropic Medication</u></b> (2 Elements) <ol style="list-style-type: none"> <li>1. Current Court Authorization for Administration of Psychotropic Medication</li> <li>2. Current Psychiatric Evaluation Review</li> </ol>	Full Compliance (All)
VIII	<b><u>Personal Rights and Social/Emotional Well-Being</u></b> (10 Elements) <ol style="list-style-type: none"> <li>1. Children Informed of Agency's Policies and Procedures</li> <li>2. Children Feel Safe in the CFP Home</li> <li>3. CFPs' Efforts to Provide Nutritious Meals and Snacks</li> <li>4. CFPs Treat Children with Respect and Dignity</li> <li>5. Children Allowed Private Visits, Calls and to Receive Correspondence</li> <li>6. Children Free to Attend or Not Attend Religious Services/Activities of Their Choices</li> <li>7. Children's Chores Reasonable</li> <li>8. Children Informed About Their Medication and Right to Refuse Medication</li> <li>9. Children Aware of Right to Refuse or Receive Medical, Dental and Psychiatric Care</li> <li>10. Children Given Opportunities to Participate in Extracurricular Activities, Enrichment and Social Activities at the CFP Home, School, Community</li> </ol>	Full Compliance (All)
IX	<b><u>Personal Needs/Survival and Economic Well-Being</u></b> (7 Elements) <ol style="list-style-type: none"> <li>1. Clothing Allowance Provided in Accordance with FFA Program Statement</li> <li>2. Ongoing Clothing Inventories of Adequate Quantity and Quality</li> <li>3. Children Involved in the Selection of Their Clothing</li> <li>4. Provision of Sufficient Supply of Clean Towels and Personal Care Items Meeting Ethnic Needs</li> <li>5. Minimum Weekly Monetary Allowances</li> <li>6. Management of Allowance/Earnings</li> <li>7. Encouragement and Assistance with a Life Book or Photo Album</li> </ol>	Full Compliance (All)

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X	<p><b><u>Discharged Children</u></b> (3 Elements)</p> <ol style="list-style-type: none"> <li>1. Completed Discharge Summary</li> <li>2. Attempts to Stabilize Children's Placement</li> <li>3. Child Completed High School (if applicable)</li> </ol>	Full Compliance (All)
XI	<p><b><u>Personnel Records</u></b> (9 Elements)</p> <ol style="list-style-type: none"> <li>1. Criminal Clearances (FBI, DOJ, CACI) Signed and Submitted Timely</li> <li>2. Timely, Completed, Signed Criminal Background Statement</li> <li>3. FFA Social Workers Met Education/Experience Requirements</li> <li>4. Timely Employee Health Screening/TB Clearances</li> <li>5. Valid Driver's License and Auto Insurance</li> <li>6. FFA Employees Signed Copies of FFA Policies and Procedures</li> <li>7. FFA Employees Completed All Required Training and Documentation Maintained</li> <li>8. FFA Social Workers Have Appropriate Caseload Ratio</li> <li>9. FFA Maintained Written Declarations for Part-Time Contracted FFA Social Workers Caseloads Not to Exceed a Total of 15 Children</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Full Compliance</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Improvement Needed</li> <li>8. Full Compliance</li> <li>9. Full Compliance</li> </ol>

**CONCEPT 7 FOSTER FAMILY AGENCY  
CONTRACT COMPLIANCE REVIEW  
FISCAL YEAR 2015-2016**

**SCOPE OF REVIEW**

The following report is based on a "point in time" review. This compliance report addresses findings noted during the November 2015 review. The purpose of this review was to assess Concept 7 Foster Family Agency's (the FFA's) compliance with the County contract and State regulations and included a review of the FFA's program statement, as well as internal administrative policies and procedures. The compliance review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- Facility and Environment,
- Maintenance of Required Documentation and Service Delivery,
- Education and Workforce Readiness,
- Health and Medical Needs,
- Psychotropic Medication,
- Personal Rights and Social/Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children, and
- Personnel Records.

For the purpose of this review, 12 placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed each child and reviewed their case files to assess the care and services they received. During the home visits, the children were observed to be comfortable and well-cared for in the Certified Foster Homes (CFHs) and their Certified Foster Parents (CFPs) were observed to be responsive to the needs of the children. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, five placed children were prescribed psychotropic medication. These children's case files were reviewed to assess for timeliness of Psychotropic Medication Authorizations and required documentation of psychiatric monitoring.

CAD reviewed five CFP files and five staff files for compliance with Title 22 Regulations and County contract requirements. Site visits were conducted to the FFA and the CFHs to assess the quality of care and supervision provided to the placed children.

**CONTRACTUAL COMPLIANCE**

CAD found the following three areas out of compliance:

**Licensure/Contract Requirements**

- Special Incident Reports (SIRs) were not submitted timely.

## CONCEPT 7 FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW

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CAD reviewed 18 SIRs and noted that one SIR was submitted five days late into I-Track.

- Community Care Licensing (CCL) citations.

Community Care Licensing (CCL) cited the FFA on May 14, 2015, as a result of a complaint received by CCL on December 22, 2014. CCL issued a citation for a personal rights violation. A Plan of Correction (POC) was requested for the FFA to ensure that all adults that care and supervise foster children receive additional training regarding personal rights. CCL cleared the required POC on May 27, 2015. An investigation was completed by the Out-of-Home Care Investigation Section (OHCIS), in which allegations of emotional abuse were inconclusive and allegations of general neglect were unfounded.

CCL cited the FFA on August 17, 2015, as a result of a complaint received by CCL on June 3, 2015. CCL issued a citation for violation of personal rights and substantiated a sexual abuse allegation. The POC required the FFA to only place school age children in the home. An investigation was completed by OHCIS and allegations of sexual abuse and general neglect were substantiated. The home was decertified by the FFA on September 14, 2015.

CCL cited the FFA on March 16, 2015, as a result of a complaint received by CCL on January 21, 2015. CCL issued a citation for Care and Supervision. The FFA provided additional training to the CFP and proof of a doctor's visit was provided as part of the required POC. The POC was cleared by CCL on February 4, 2016. An investigation was completed by OHCIS where allegations of general neglect were determined to be unfounded.

CCL cited the FFA on April 22, 2015, as a result of a complaint received by CCL on March 10, 2015. CCL substantiated a Personal Rights violation. A POC was requested for the FFA to provide training to the identified CFP which was completed on April 29, 2015. The POC was cleared by CCL on April 16, 2015. An investigation was completed by an Emergency Response (ER) Children's Social Worker (CSW) and allegations of physical abuse were determined to be inconclusive. OHCIS requested a Corrective Action Plan (CAP) which included re-training the CFP, not placing any additional children in this home with the two current placed siblings, and the CFP not using her daughter as a babysitter or as a child care provider.

CCL cited the FFA on September 16, 2015, as a result of a report by the FFA that the CFP was not monitoring the visits between a placed child and his/her biological parent. Consequently, the placed child was removed on September 14, 2015 and the home was decertified on September 15, 2015. The POC was cleared by CCL on September 16, 2015. No investigation was completed by OHCIS for this incident.

CCL cited the FFA as a result of a complaint received by CCL on February 4, 2015. CCL substantiated allegations that a placed child was sexually abused in a CFH in 2009. The home was decertified in 2009 and no further action was taken.



**Recommendations:**

The FFA's management shall ensure that:

1. SIRs are submitted timely.
2. The FFA is in compliance with Title 22 Regulations and free of CCL citations.

**Maintenance of Required Documentation and Service Delivery**

- FFA did not obtain the DCFS CSW's authorization to implement Needs and Services Plans (NSPs).

Twenty-seven of forty-three NSPs reviewed did not have the DCFS CSWs' signatures. The efforts listed to obtain the CSWs' signatures on the NSPs were not within the mandated timeframe of three attempts within five days, and ranged from a day or week, to a month apart.

- CFPs did not participate in the development of NSPs.

Four of forty-three NSPs reviewed did not have CFP signatures.

**Recommendations:**

The FFA's management shall ensure that:

3. FFA obtains or documents efforts to obtain DCFS CSW's authorization to implement NSPs.
4. CFPs participate in the development of NSPs.

**Personnel Records**

- Employees did not complete all required training and documentation was not maintained.

CAD reviewed five employee files. It was noted that one employee completed four training hours in 2015 which is below the required minimum of 12 hours of ongoing training according to the FFA's Program Statement.

**Recommendation:**

The FFA's management shall ensure that:

5. Employees complete all required training and documentation for completion is maintained.

**PRIOR YEAR FOLLOW-UP FROM DCFS CAD'S FFA CONTRACT COMPLIANCE REVIEW**

CAD's last compliance report dated December 29, 2015, identified eight recommendations.

**Results:**

Based on the results of this review, the FFA fully implemented 5 of 8 previous recommendations for which the FFA was to ensure that:

- It maintains documentation of the annual vehicle maintenance for CFPs and designated drivers in its files.
- Adequate perishable and non-perishable food is maintained.
- FFA social workers develop Initial NSPs with the child's participation.
- FFA social workers develop timely, comprehensive Updated NSPs with the child's participation.
- Child's academic performance and/or attendance increase.

Based on the results of the current review, the FFA did not implement 3 of 8 recommendations for which the FFA was to ensure that:

- The FFA is in full compliance with Title 22 Regulations and free from CCL complaints.
- The FFA obtains or documents efforts to obtain DCFS Children's Social Worker's authorization to implement NSPs.
- FFA employees complete all required training.

**Recommendation:**

The FFA's management shall ensure that:

6. The outstanding recommendations from the prior report noted in this report as recommendation numbers 2, 3, and 5 are fully implemented.

At the exit conference, the FFA representatives stated their desire to remain in compliance with Title 22 Regulations and contractual requirements and reiterated that the FFA will implement procedures to strive towards greater compliance. The FFA will consult with the Out-of-Home Care Management Division for additional support and technical assistance and CAD will continue to assess implementation of the recommendations during the next review period.



# Concept 7

Family Support & Treatment Centers

January 25, 2016

Matthew St. John  
Children Services Administrator I  
Contracts Compliance Administrator  
County of Los Angeles  
Department of Children and Family Services  
Contracts Administration Division  
3530 Wilshire Blvd., 4<sup>th</sup> Floor  
Los Angeles, CA 90010

Dear Mr. St. John,

We have carefully examined the summary of findings resulting from the 2015 Monitoring Review for Concept 7 FFA. We appreciate your input during the exit conference last month. We began the process of familiarizing the staff and current certified foster families regarding the findings noted so that in collaboration understand and support the implementation of identified strategies intended to enhance Concept 7's delivery of services and better our outcomes. Following is a list of the identified strategies/plan on addressing the findings identified:

**1) Licensure/Contract Requirements (Items #2 and #4)**

C7SWs and certified foster families will receive training regarding the 2015 Compliance Monitoring Review findings and plan of correction by 1/31/16. The C7SWs will be trained by the Regional Director (RD) and the C7SWs will train the assigned CFPs. The RD will conduct training to all CFPs on the topic of Safety Interventions for Children in Out-of-Home Placement, including the prevention of allegations and citations for substantiated findings. Thereafter, during quarterly home inspections, the C7SWs will review with the CFPs the topics of C7's Policy and Procedures on reporting SIRs in a timely manner, and overview of prevention of allegations and citations for substantiated findings. Every SIR generated will be discussed with the CFP by the assigned C7SW within 14 days from date of incident. This discussion will include a summary of the safety and prevention interventions discussed with the CFP. The C7SW will note this summary of preventions provided on the SIR report, supported by the C7SW's and CFP's initials/signatures.

**2) Maintenance of Required Documentation and Service Delivery (Items #27 and #28)**

The C7SWs will start the process of scheduling a teamwork meeting 30 days prior to the NSP due date. This teamwork meeting will be scheduled at least 10 days prior to the start of the 5 day grace period. The teamwork members will include the CSW, FC, CFP, C7SW and other service providers who will discuss and evaluate the progress of the child's case plan, assess and modify the NSP goals, as a group. The C7SW will obtain the signatures of CSW, CFP and FC signatures before the end of this teamwork meeting. If it is determined that the

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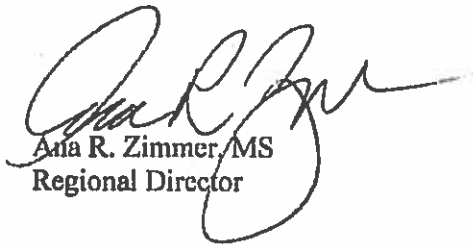
CSW will be unavailable to participate in teamwork meeting, the C7SW will on separate dates, document at least three (3) attempts made to obtain the CSWs approval for the NSP implementation. The attempts will be made before the end of the 5 day grace period.

3) Personnel Records (Item # 74)

The Regional Director/Site supervisor will keep track of the incorporated on-going staff development training related to Child Welfare offered during monthly staff meetings throughout the year. The C7SWs will attend professional conference training, including DCFS/CCL sponsored training of mandatory topics. The RD/site supervisor and the C7SW will assess at least twice a year, the status of the C7SW's requirement of meeting the 20 hours minimum training required annually, as is indicated in the C7's mission statement.

This concludes our recommended correction action plan strategies intended to meet compliance and address the deficiencies noted during the Monitoring Review for 2015. As always, we will remain open to receiving your feedback and guidance during this process. Please, feel free to contact me at (562) 236-8200, ext. 311, if you have any questions or recommendations. Thank you.

Sincerely,



Anna R. Zimmer, MS  
Regional Director

CC: John Peel, CEO